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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SAMANTHA A. GALING,
an individual;

Plaintiff,

v.

NEVADA STATE EDUCATION
ASSOCIATION a Domestic Non-
Profit Coop. Corporation; EDUCATION
SUPPORT EMPLOYEES ASSOCIATION
a Domestic Non-Profit Coop. Corporation;
DOES 1 through X, inclusive; ROE
CORPORATIONS I through X, inclusive;

Defendants.

Case No.: 2:16-CV-00993-APG-PAL

**STIPULATION AND ORDER TO
EXTEND DISCOVERY AND DISPOSITIVE
MOTION DEADLINES**

(FIRST REQUEST)

Pursuant to LR 6-1, 6-2 and 26-4 and for the reasons provided below, the parties, through their respective counsel request that the Court extend the discovery and dispositive motion deadlines in this matter for the limited purpose of allowing Plaintiff to take the depositions of Brian Christensen and Gary Peck. This is the first request for an extension of the discovery and dispositive motion deadlines.

1. Discovery Completed to Date:

- A. The parties have disclosed numerous records and evidence;
- B. The parties have propounded and answered interrogatories; requests for admission; and requests for production;

1 C. Defendants have taken the deposition of Plaintiff;

2 D. The parties have produced numerous FRCP 26 disclosures.

3 **2. Discovery that Remains to be Completed:**

4 A. Plaintiff seeks to take the depositions of Brian Christensen and Gary Peck. Plaintiff
5 anticipates taking the aforementioned depositions by March 24, 2017.

6 **3. Why Discovery Was Not Completed Within the Limits Set by the Discovery Order**

7 On January 3, 2017, Plaintiff noticed the depositions of Brian Christensen and Gary Peck,
8 both former employees of Defendant NSEA, for January 19, 2017. Mr. Peck was not available on
9 January 19, 2017, and the parties agreed that Mr. Peck's deposition would be rescheduled for a more
10 convenient time after the close of discovery on January 23, 2017.

11 With regards to Mr. Christensen, Defendants were unable to provide Plaintiff with current
12 contact information for Mr. Christensen until January 10, 2017. Given that Defendants had been
13 unable to provide current contact information for Mr. Christensen until January 10, 2017, Defendants
14 agreed to give Plaintiff additional time after the close of discovery in order to subpoena Mr.
15 Christensen.

16 **4. Proposed Schedule for Completing Discovery and Filing Dispositive Motions**

17 On October 31, 2016, this Court ordered that the last date to complete discovery would be
18 January 23, 2017, and that the last day to file dispositive motions would be February 22, 2017. The
19 proposed schedule for completing the remaining discovery and to file dispositive motions is as
20 follows:

21 Last day to complete depositions mentioned herein: March 24, 2017

22 Last day to file dispositive motions: April 23, 2017

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